

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

|  |   |                        |
|--|---|------------------------|
| ----- X  |   |                        |
| A.T., a minor, by and through his parent and   | : |                        |
| natural guardian SHA-KEEMA TILLMAN,            | : |                        |
| et al., on behalf of themselves and all others | : |                        |
| similarly situated,                            | : |                        |
| Plaintiffs,                                    | : | 17-CV-0817 (DNH) (DEP) |
|  | : |                        |
| v.   | : |                        |
|  | : |                        |
| DAVID HARDER, Broome County Sheriff, in his    | : |                        |
| official capacity, et al.                      | : |                        |
|  | : |                        |
| Defendants.                                    | : |                        |
| ----- X  |   |                        |

**NOTICE OF JOINT MOTION FOR  
PRELIMINARY APPROVAL OF CLASS-ACTION SETTLEMENT, AND APPROVAL  
AND DISTRIBUTION OF THE NOTICE OF SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Rule 23 of the Federal Rules of Civil Procedure, the plaintiffs and defendants will jointly move this Court, at 10 Broad Street, Utica, New York, on a date and at a time set by the Court, to grant preliminary approval of the proposed settlement agreement attached as Exhibit 1 to this Notice; approve the form of the class notice, and direct the Broome County Sheriff's Office to provide notice to all class members; provide class members with thirty days after Notice is posted and served to comment on the proposed settlement as specified in the Notice; and set a date for a fairness hearing for final approval of the settlement.

Date: July 9, 2018  
Syracuse, N.Y.

Respectfully submitted,

/s/Joshua Cotter

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